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February 2, 2018

By ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Presentation of American Cable Association, GN Docket No. 17-183

Dear Ms. Dortch:

On January 31, 2018, Mary Lovejoy, Vice President of Regulatory Affairs, American Cable Association (“ACA”), Pantelis Michalopoulos, Steptoe & Johnson LLP and the undersigned met with Thomas Buckley, Sarah Stone and Ronald Helvajian from the Office of Managing Director. On February 2, 2018, ACA and its representatives met with Rachael Bender, Legal Advisor to Chairman Pai.

During the meetings, ACA discussed the need for the Commission to update its database to reflect the number of current C-band receive-only earth stations in operation. ACA reiterated its estimate that the receive-only earth stations of as many as 90 percent of the 3,000 systems operated by its members are unregistered. The Notice of Inquiry similarly suggests there are thousands more of unregistered receive-only earth stations throughout the country. One reason for these large numbers is the burdens associated with registration: the \$435 filing fee and the cost of commissioning an independent frequency coordinator to conduct a coordination study. Inducing thousands of small businesses to commit to a \$1,000 expenditure, plus an expenditure of other resources, would likely be an impediment to obtaining information on currently operational C-band receive-only earth stations.

ACA therefore believes that a streamlined process for registering existing C-band receive-only earth stations is necessary and appropriate as part of the Commission’s efforts to collect comprehensive information on the use of the C-band. That process would involve, among other things, a fee waiver. ACA looks forward to working with the Commission to resolve the issue of significant under-registration of receive-only earth stations in an efficient and realistic manner.

Marlene H. Dortch
February 2, 2018
Page 2 of 2



Respectfully submitted,

A handwritten signature in black ink, appearing to read "Georgios Leris".

Georgios Leris
Counsel for American Cable Association

CC: Meeting participants